

Remarks

The Office Action mailed February 12, 2008 and made final has been carefully reviewed and the following remarks have been made in consequence thereof.

Claims 1-3, 5-6, 8-18, 20, 23-36 and 38-45 are now pending in this application. Claims 1-6, 8-18, 20, 23-36 and 38-42 stand rejected. Claims 4, 7, 19, 21, 22 and 37 were previously cancelled.

The rejection of Claims 1-3, 5, 6, 8-18, 20, 23-36 and 38-42 under 35 U.S.C. § 103(a) as being unpatentable over Krishnan et al. (U.S. Pub. No. 2002/0184068) ("Krishnan") is respectfully traversed.

Applicant respectfully submits that Krishnan is distinguishable from the subject matter claimed herein, and accordingly does not describe or suggest the claimed invention. Krishnan does not provide a rational underpinning for a reasoned conclusion of obviousness for the subject matter claimed herein for at least the following reasons.

Figures 13-15 and paragraphs 120-133 of Krishnan are cited as disclosing information that is stored and retrieved for three different business unit levels, namely Manager, Policy Maker and Worker. Applicant submits that the cited portions of Krishnan do not disclose a creation of a hierarchy of business units included within a business entity as presently claimed in independent claims 1, 11, 16, 17, 27 and 33, but rather discloses a personnel-based hierarchy of information storage and retrieval. This is believed to be evident from Figures 13-15 of Krishnan wherein persons at different personnel levels (Manager, Policy Maker, and Worker) are presented with different information and different options in the respective displays shown in Figures 13-15. As such, Krishnan is conceptually different from the present claimed subject matter in important aspects, including but not limited to how information is organized, stored, processed, retrieved and presented to system users. In light of such fundamental differences, the presently claimed subject matter is not believed to be obvious.

Each of independent claims 1, 11, 16, 17, 27 and 33 recites that the hierarchy of business units includes at least the business entity level, an organization level, a site level, a department level and a building level. Such levels of business units are not contemplated by the Krishnan disclosure, nor is Krishnan suggestive of such a hierarchy of business units. Rather, and as noted above, Krishnan discloses a personnel-based hierarchy of users that are each provided access to certain information that is specific to each user. Further, the information provided is not organized or presented using a business-based hierarchy having multiple levels of information including a business entity level, an organization level, a site level, a department level and a building level as claimed. The business-based hierarchy facilitates a focus on *where* in the larger business entity tasks are to be performed. Such information does not appear to be relevant to the Krishnan disclosure and Krishnan does not objectively suggest any desirability of providing such information.

Further, and related to the points above, each of the independent claims 1, 11, 16, 17, 27 and 33 recites that the CA information includes a responsible person assigned to each task at each business unit at each level within the hierarchy of business units. Figure 18 of Krishnan shows a list of names associated with a number of tasks, but conspicuously does not identify their association with a particular business unit in a larger business entity. Applicant submits that this is further evidence of the user-based hierarchy that Krishnan appears to disclose, wherein the information turns upon specific people, but not their location in the larger business entity structure. Again, the business-based hierarchy recited in the present claims provides focus on *where* in the larger business entity tasks are to be performed. Krishnan does not disclose a business-based hierarchy, and therefore does not render the storage of “a responsible person assigned to each task at each business unit at each level within the hierarchy of business units” obvious. As applied by the Office, the business unit levels disclosed by Krishnan are personnel-based Manager, Policy Maker and Worker levels, but nothing in Figures 13-15 of Krishnan fairly disclose or suggest specifically to whom tasks are assigned at the Manager, Policy Maker and Worker levels.

Independent claims 1, 11, 16, 17, 27 and 33 recite aspects of notification of CA tasks to be performed at a selected location and corresponding CA deadlines “including providing the

CA tasks and the responsible person assigned to each CA task for the selected business unit.” Figure 18 and paragraph 136 of Krishnan disclose that the system displays a list of responsible persons for a number of tasks, but fails to disclose or suggest a responsible person assigned to each CA task *for the selected business unit* as the present claims recite. Indeed, it is not immediately clear from the Krishnan disclosure whether the information shown in Figure 18 is accessible from each of the Manager, Policy Maker and Worker levels and the associated screens shown in Figures 13-15.

For at least the reasons stated above, the independent claims 1, 11, 16, 17, 27 and 33 are not obvious over Krishnan, and independent claims 1, 11, 16, 17, 27 and 33 are respectfully submitted to be patentable over the cited art.

The recitations of dependent claims 2-3, 5, 6, 8-10, 12-15, 18, 20, 23-26, 28-32, 34-40 and 41-42, when considered in combination with the respective base claims, are likewise submitted to be patentable over the cited art.

Moreover, the recitations of at least dependent claims 2, 12, 23, 28 and 35 are believed to be independently patentable over Krishnan, as Krishnan nowhere discloses or suggests CA information that is retrievable and displayable in response to a selected business entity included within the business entity level, or by a selected organization included within the organization level corresponding to the selected business entity, or by a selected site which is included within the site level corresponding to the selected organization, or by a selected department which is included within the department level corresponding to the selected site, or by a selected building that is included within the building level corresponding to the selected department. Such levels are not available for a user to select in the system described by Krishnan and the Krishnan system is accordingly not suggestive of retrieving and displaying information in response to the selected levels.

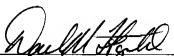
For at least the reasons set forth above, Applicant respectfully requests that the Section 103 rejection of Claims 1-3, 5, 6, 8-18, 20, 23-36 and 38-42 be withdrawn.

With respect to the newly added claims 43-45, Krishnan nowhere discloses or suggests recited aspects of “the responsible person for a given CA task may be different at each level of

the hierarchy of business units" as recited in claims 43 and 44, and wherein the CA information may include a different responsible person assigned to each task at different levels of the hierarchy of business units as recited in claim 45. Krishnan does not disclose the different levels of the hierarchy of the business units as these claims recite, and in Figure 18 shows a single name associated with each task without indication regarding the location of the individuals named in the business entity. Claims 43-45 are therefore submitted to be patentable over the cited art.

In view of the foregoing remarks, all the Claims now active in the application are believed to be in condition for allowance. Favorable action is respectfully solicited.

Respectfully Submitted,



Daniel M. Fitzgerald
Reg. No. 38,880
ARMSTRONG TEASDALE LLP
One Metropolitan Square, Suite 2600
St. Louis, Missouri 63102-2740
(314) 621-5070